

REMARKS

Reconsideration of the rejections of Claims 1-9 and 13 as being anticipated by Clark et al., of Claim 1 and 6-24 as being anticipated by Dyble et al. and of Claims 12-24 as being anticipated by Bruns, each under 35 U.S.C. § 102(b), and the rejection of Claims 10 and 11 as being unpatentable over Clark et al. in view of Brandstetter and of Claims 2-5 and 25 as being unpatentable over Dyble et al. in view of Morita et al., each under 35 U.S.C. § 103(a), is requested.

Newly amended independent Claims 1, 12 and 13 define a method and system, respectively, which is neither anticipated by nor obvious over the aforementioned references. Moreover, the asserted Section 103 rejections do not set forth a prima facie case of obviousness based on substantial record evidence. Instead, they use applicants' own disclosure against the applicants.

In contrast to known multi-stage presses, the present invention provides greater versatility by allowing energy beam devices such as laser heads to move along the contour of workpieces with complicated shapes by providing the local energy feed with the ability to move linearly and tilt. That is, the device can be moved along as perpendicular to the transport direction and also be tilted to orientate the energy beam perpendicular to the curved surfaces of the workpiece as described, for example, at page 8, lines 10-26 of the Specification. The cited references do not teach or suggest such an arrangement.

The Clark et al. turret punch machine tool and laser cutting unit has a laser head (Fig. 4) which is movable up and down. No tilting movement is possible, however, therefore, making it possible to process only flat sheet metal.

The Dyble et al. and Bruns patents are totally lacking in any disclosure of a laser head within a multi-station press. The Dyble et al. patent discloses only a method for making clear plastic canisters in which the machine uses welding. Even if it could be argued that the welder moves perpendicularly to the original transport direction, no means whatsoever is provided to allow the curved contour of a work piece to be followed.

The Morita et al. patent discloses a plurality of machining and assembling cells with embedded laser machining centers. One of ordinary skill would not consider this arrangement to be multi-station presses. Assuming that the teachings of the Morita et al. Patent would have been combinable with any of the other cited references, one of ordinary skill would not have produced lasers integrated into a multi-station press. The Morita et al. system did not provide a carriage for the laser heads which moves in at least one or two spatial or linear directions and also tilts around at least one axis.


Accordingly, favorable action upon the claims in this application is earnestly solicited.

If there are any questions regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

If necessary to effect a timely response, this paper should be considered as a petition for an Extension of Time sufficient to effect a timely response, and please charge any deficiency in fees or credit any overpayments to Deposit Account No. 05-1323 (Docket #852/48374).

Respectfully submitted,

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